

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

Reed Timmer	:	
Plaintiff	:	
	:	
vs	:	Case No. 8:25-cv-00920-DL B
	:	
Marquee Broadcasting Inc	:	
Defendant	:	

DEFENDANT’S ANSWER AND AFFIRMATIVE DEFENSES

Should this Court not grant Defendant’s Motion to Dismiss this case, Defendant hereby submits its Answer and affirmative defenses to Plaintiff’s Complaint.

Introduction

Defendant agrees that it is an American broadcasting company that owns several television stations in the United States, but denies that it owns and operates a Facebook account with the name “CBS 44 News South Georgia.” Furthermore, Defendant denies that it used Plaintiff’s video and denies it violated any copyright laws concerning the Plaintiff’s works.

Parties

Defendant admits that it is a Maryland corporation doing business in Maryland.

Jurisdiction and Venue

Defendant admits that jurisdiction over Federal copyright issues and venue are proper with this Court.

Facts Common to All Claims

A. Plaintiff’s Copyright Ownership and Investment

Defendant neither admits nor denies these statements as they are outside its scope of information and belief. (Paragraphs 11-18)

B. Defendant's Infringing Activity

1. Defendant denies the allegations of Paragraph 19 of the Plaintiff's Complaint.
2. Defendant denies the allegations of Paragraph 20 of the Plaintiff's Complaint..
3. Defendant denies the allegations of Paragraph 21 of the Plaintiff's Complaint.
4. Defendant denies the allegations of Paragraph 22 of the Plaintiff's Complaint.
5. Defendant denies the allegations of Paragraph 23 of the Plaintiff's Complaint.
6. Defendant denies the allegations of Paragraph 24 of the Plaintiff's Complaint.
7. Defendant denies the allegations of Paragraph 25 of the Plaintiff's Complaint.
8. Defendant denies the allegations of Paragraph 26 of the Plaintiff's Complaint.
9. Defendant denies the allegations of Paragraph 27 of the Plaintiff's Complaint.
10. Defendant denies the allegations of Paragraph 28 of the Plaintiff's Complaint.
11. Defendant denies the allegations of Paragraph 29 of the Plaintiff's Complaint.
12. Defendant denies the allegations of Paragraph 30 of the Plaintiff's Complaint.
13. Defendant denies the allegations of Paragraph 31 of the Plaintiff's Complaint.
14. Defendant denies the allegations of Paragraph 32 of the Plaintiff's Complaint.
15. Defendant denies the allegations of Paragraph 33 of the Plaintiff's Complaint.
16. Defendant denies the allegations of Paragraph 34 of the Plaintiff's Complaint.
17. Defendant denies the allegations of Paragraph 35 of the Plaintiff's Complaint.
18. Defendant denies the allegations of Paragraph 36 of the Plaintiff's Complaint.
19. Defendant denies the allegations of Paragraph 37 of the Plaintiff's Complaint.
20. Defendant denies the allegations of Paragraph 38 of the Plaintiff's Complaint.
21. Defendant denies the allegations of Paragraph 39 of the Plaintiff's Complaint.
22. Defendant denies the allegations of Paragraph 40 of the Plaintiff's Complaint.
23. Defendant denies the allegations of Paragraph 41 of the Plaintiff's Complaint.
24. Defendant denies the allegations of Paragraph 42 of the Plaintiff's Complaint.
25. Defendant denies the allegations of Paragraph 43 of the Plaintiff's Complaint.
26. Defendant denies the allegations of Paragraph 44 of the Plaintiff's Complaint.
27. Defendant denies the allegations of Paragraph 45 of the Plaintiff's Complaint.
28. Defendant denies the allegations of Paragraph 46 of the Plaintiff's Complaint.
29. Defendant denies the allegations of Paragraph 47 of the Plaintiff's Complaint.
30. Defendant denies the allegations of Paragraph 48 of the Plaintiff's Complaint.

First Count

1. Defendant neither admits nor denies these statements in Paragraph 50 as they are outside its scope of information and belief.
2. Defendant neither admits nor denies these statements in Paragraph 51 as they are outside its scope of information and belief
3. Defendant neither admits nor denies these statements in Paragraph 52 as they are outside its scope of information and belief.

4. Defendant denies the allegations of Paragraph 53 of the Plaintiff's Complaint.
5. Defendant denies the allegations of Paragraph 54 of the Plaintiff's Complaint.
6. Defendant denies the allegations of Paragraph 55 of the Plaintiff's Complaint.
7. Defendant denies the allegations of Paragraph 56 of the Plaintiff's Complaint.
8. Defendant denies the allegations of Paragraph 57 of the Plaintiff's Complaint.
9. Defendant denies the allegations of Paragraph 58 of the Plaintiff's Complaint.

Affirmative Defenses

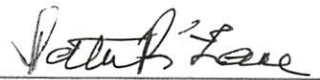
1. The Defendant does not own or control the Facebook account that Plaintiff alleges used its copyrighted video. The Defendant does not own or control the television station on which the Plaintiff alleges its copyrighted information was used. The Plaintiff brought suit against the wrong party.
2. Since the Defendant is not the proper party in this Action, the Plaintiff has not and cannot offer a valid cause of action against the Defendant with the facts presented in Plaintiff's Complaint.

Prayer

WHEREFORE, Defendant prays that its Answer be deemed good and sufficient and all claims by Plaintiff against Defendant be dismissed with prejudice, and such other and further legal and equitable relief, including court costs and attorney's fees, be awarded Defendant.

Dated: May 20, 2025

Respectfully submitted.



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Attorney for Defendant

CERTIFICATE OF SERVICE

I, Patricia R Lane, hereby certify that I have on May 20, 2025, filed the foregoing Defendant's Answer and Affirmative Defenses electronically through the Court's Electronic Filing System. They are available for viewing and downloading from the CM/ECF System. Electronic service of the Notice of Electronic Case Filing generated by the ECF System constitutes service of the filed documents on the following parties who have consented to electronic service: Craig Sanders. Earle Ovington Blvd, Suite 402, Uniondale, NY 11553



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